

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE AMERICAN BUSINESS PRESS WITNESS CRAIN
(USPS/ABP-T1-37)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the American Business Press witness Crain: USPS/ABP-T1-37.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

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February 11, 1998

USPS/ABP-T1-37. In response to USPS/ABP-T1-3, you provided a list of Crain Communications Inc. publications in June 1986 and June 1997.

- a. Does Crain Communications Inc. know generally how its mailings are prepared and how that preparation has changed for each of the last ten years? If so, please explain fully.
- b. Does Crain Communications Inc. have any general information about its mailings which would indicate, by year, the changes in make-up such as changes in average bundle size, changes in containerization, and the average number of bundles and pieces per container? If so, please explain fully.
- c. Does Crain Communications Inc. have any information about its mailings which would indicate in percentage terms, what savings, if any, it has experienced in its mail preparation costs (excluding postage) due to changes in the make-up of its mailings? If so, please explain fully.
- d. Even if a percentage cannot be calculated for such savings, as requested in subpart (c) above, please indicate whether or not Crain Communications Inc. has experienced savings.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Susan M. Duchek

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